

### REMARKS

Reconsideration of the rejections set forth in the Office Action dated July 7, 2010, is respectfully requested. In the Office Action, the Examiner rejected claims 12-31. Applicants have canceled claims 15, 16, 21, 27, and 31, amended claims 12-14, 17-20, 22, 23, 25, 26, and 28-30, and added new claims 32-36. Accordingly, claims 12-14, 17-20, 22-26, 28-30, and 32-36 are pending in the application. No new matter has been added as can be confirmed by the Examiner.

A. The Written Specification Has Been Amended To Improve Readability.

Minor amendments have been made throughout the written specification. These amendments are principally of a typographical or grammatical nature and are believed to even further improve the readability of the written specification. No new matter has been added by these amendments. Accordingly, entry of these minor amendments is respectfully requested.

B. The Cited Prior Art Does Not Disclose Nor Suggest Providing A Second Content Catalog Of Second Entertainment Files That Includes A Content Rating Of The Second Entertainment Files And, If The Content Rating Of A Selected Second Entertainment File Satisfies A Predetermined Content Standard, Enabling A Second Portable Media Device To Receive The Selected Second Entertainment File In Its Entirety And A Local Content Source To Store An Archival Copy Of The Selected Second Entertainment File As Set Forth In Claim 12, As Amended.

In the Office Action, the Examiner rejected claims 12-31 under 35 U.S.C. § 103(a) as allegedly being rendered obvious by Galipeau et al. (hereinafter "Galipeau"), United States Patent No. 6,249,913, in view of Wilson et al. (hereinafter "Wilson"), United States Patent Publication No. US 2004/0192339 A1, in further view of Decinque et al. (hereinafter "Decinque"), United States Patent No. 6,286,139. Applicants respectfully submit, however that, by failing to disclose each and every element of independent claim 12, as amended, Galipeau in view of Wilson in further view of Decinque does not bear upon the patentability of amended independent claim 12. Accordingly, it is submitted that independent claim 12, as well as claims 13, 14, 17-20, 22-24, and 32-36 that dependent therefrom, are in condition for allowance.

Among of the features, claim 12 has been amended to further recite:

a second content catalog of second entertainment files including **a content rating** of the second entertainment files; and

a headend system enabling a second portable media device to receive a selected second entertainment file in its entirety from a second content library and a local content to store an archival copy of the selected second entertainment file each **if the content rating of the selected second entertainment file satisfies a predetermined content standard**.

With reference to (currently deleted) dependent claim 20, the Examiner asserts that Galipeau in view of Wilson in further view of Decinque teaches a system, "wherein said headend system inhibits said first portable media device from uploading inappropriate viewing content to the content source (Galipeau column 12 lines 5-8 [sic, lines 41-44] *internet server authenticates information coming on and off aircraft*).". In contrast to the assertion of the Examiner, Applicants respectfully submit that one of ordinary skill in the relevant art at the time of invention would not understand Galipeau's disclosure of "the on-aircraft internet server can authenticate the information coming on and off aircraft" to mean that the on-aircraft internet server inhibits uploading (or downloading) of a selected second entertainment file based upon a content rating as recited in claim 12. Pages 1-2 of Microsoft's IAS as a RADIUS Server (currently available at [http://technet.microsoft.com/en-us/library/cc758376\(WS.10\).aspx](http://technet.microsoft.com/en-us/library/cc758376(WS.10).aspx)), for example, teaches that Internet Authentication Service (IAS) is initiated when a client computer attempts to connect with a server computer and involves verifying the credentials of the client computer prior to establishing a connection for permitting files and other information to be exchanged between the client computer and the server computer. If the connection attempt is not authenticated or authorized, the connection is rejected. See id.

The Examiner relies solely upon the teachings of Galipeau at column 12, lines 41-44, to reject dependent claim 20 and does not, and cannot, assert that Galipeau in view of Wilson in further view of Decinque teaches, nor even suggests, providing a second content catalog of second entertainment files that includes a content rating of the second entertainment files and, if

the content rating of a selected second entertainment file satisfies a predetermined content standard, enabling a second portable media device to receive the selected second entertainment file in its entirety and a local content source to store an archival copy of the selected second entertainment file as set forth in claim 12, as amended. Although Galipeau at col. 12:39-41 briefly describes caching web pages and email, the caching of the web pages and email is merely temporary and does not give rise to storage of the archival copy of the selected second entertainment file in the claimed manner.

Accordingly, it is respectfully submitted that Galipeau, Wilson, and Decinque, taken alone or in combination, do not describe, nor suggest, these features. For at least the reasons set forth above, Applicants submit that claims 12-14, 17-20, 22-24, and 32-36 are in condition for allowance.

C. The Cited Prior Art Does Not Disclose Nor Suggest That A Selected Second Entertainment File Is Selected And Presented At A Selected Passenger Seat Within The Second Passenger Seat Group Solely Via A User Interface System Of A Second Portable Media Device As Set Forth In Amended Claim 14.

Claim 14 recites that a selected second entertainment file is selected and presented at a selected passenger seat within the second passenger seat group *solely via a user interface system of the second portable media device*.

In the Office Action, the Examiner asserts that Galipeau in view of Wilson in further view of Decinque teaches a system, "wherein the selected first viewing content is selected and presented solely via the user interface system (Galipeau column 9 lines 22-25 *video present to personal computer*)." Galipeau, in fact, teaches an aircraft data management system with a plurality of integrated seat boxes 18 each being proximate to a set of passenger seats 12, 14 in an aircraft. (See Galipeau at Fig. 1; col. 3:52-55; col. 4:1-4.) Each integrated seat box 18 is disclosed as including function modules, which are replaceable and can be varied depending upon system requirements. (See *id.* at Figs. 5, 6b; col. 5:57-61; col. 6:14-18.) An audio module 120, for example, receives multiple audio tracks and interfaces with a passenger operated digital passenger control unit (DPCU) 124, enabling a passenger to select audio programming for

presentation via stereo (or monaural) headset plugs 130. (See id. at Fig. 6b; col. 7:34-59.) Similarly, a video module 152 interfaces with a video display panel 154 with video selections made via the digital passenger control unit 124. (See id. at Fig. 6b; col. 9:17-32.)

Galipeau discloses that **the passenger-operated digital passenger control unit 124, the headset plugs 130, and the video display panel 154 each are permanently "mounted" in the aircraft** and remain an option for selecting and presenting the video selections even when a laptop computer 226 is in use. (See id. at col. 7:55-64; col. 9:17-22.)

In contrast to the aircraft data management system with permanently-mounted passenger control units, the headset plugs, and the video display panels, claim 14 recites a second portable media device with a handheld case and an integrated user interface system, wherein a selected second entertainment file is selected and presented at a selected passenger seat within the second passenger scat group solely via a user interface system of the second portable media device. It is respectfully submitted that Galipeau, Wilson, and Decinque, taken alone or in combination, do not describe, nor suggest, this feature. For at least the reasons set forth above, Applicants submit that claim 14 is in condition for allowance.

D. The Cited Prior Art Does Not Disclose Nor Suggest A Second Portable Media Device That Is Configured To Upload A Passenger Entertainment File Associated With A Content Rating To A Local Content Source For Subsequent Download By Another Portable Media Device, And A Headend System That Enables The Local Content Source To Receive And Store The Passenger Entertainment File If The Content Rating Of The Passenger File Satisfies A Predetermined Content Standard As Set Forth In Amended Claim 19.

Claim 19 has been amended to recite a system,

wherein a second portable media device is configured to upload a passenger entertainment file associated *with a content rating* to the local content source for subsequent download by another portable media device, and

wherein a headend system enables the local content source to receive and store the passenger entertainment file *if the content rating of the passenger file satisfies the predetermined content standard.*

In the manner set forth in more detail above in Section B, one of ordinary skill in the relevant art at the time of invention would not understand Galipeau's disclosure of "the on-aircraft internet server can authenticate the information coming on and off aircraft" to mean that the on-aircraft internet server inhibits uploading (or downloading) of a selected second entertainment file based upon a content rating as recited in claim 19. Applicants therefore submit that Galipeau in view of Wilson in further view of Decinque fail to teach, nor even suggest, a second portable media device that is configured to upload a passenger entertainment file associated with a content rating and a headend system that enables the local content source to receive and store the passenger entertainment file if the content rating of the passenger file satisfies the predetermined content standard.

Accordingly, it is respectfully submitted that Galipeau, Wilson, and Decinque, taken alone or in combination, do not describe, nor suggest, these features and that that dependent claim 19 is in condition for allowance for at least the reasons set forth above.

- E. The Cited Prior Art Does Not Disclose Nor Suggest Providing A Second Content Catalog Of Second Entertainment Files That Includes A Content Rating Of The Second Entertainment Files And, If The Content Rating Of A Selected Second Entertainment File Satisfies A Predetermined Content Standard, Enabling A Second Portable Media Device To Receive The Selected Second Entertainment File In Its Entirety And A Local Content Source To Store An Archival Copy Of The Selected Second Entertainment File As Set Forth In Claims 25 and 28, As Amended.

In the Office Action, the Examiner likewise rejected independent claims 25 and 28 under 35 U.S.C. § 103(a) as allegedly being rendered obvious by Galipeau in view of Wilson in further view of Decinque.

Independent claims 25 and 28 have been amended to include further recitations that are similar to the further recitations of independent claim 12 as set forth above in Section B. For at least the reasons discussed in Section B, Applicants respectfully submit that independent claims 25 and 28, as amended, are patentable over Galipeau in view of Wilson in further view of Decinque such that claims 25, 26, and 28-30 are in condition for allowance.

F. Dependent Claims 13, 14, 17, 18, 22, 23, and 26 Have Been Amended To Conform With The Language Of The Claims, As Amended, From Which They Depend.

Applicants likewise have amended the language of dependent claims 13, 14, 17, 18, 22, 23, and 26 for purposes of consistency with the amended language of the independent claims from which they respectively depend. Accordingly, these dependent claims have not been amended for reasons of patentability.

G. Conclusion.

For at least the reasons set forth above, Applicants submit that Galipeau in view of Wilson in further view of Decinque does not bear upon the patentability of independent claims 12, 25, 27, 28, and 31 and that claims 12-31 are in condition for allowance. A Notice of Allowance is earnestly solicited. The Examiner is encouraged to contact the undersigned at (949) 567-6700 if there is any way to expedite the prosecution of the present application.

Respectfully submitted,

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